

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO: 5:17-CV-356

RICARDO MONDRAGON, EUSTORGIO  
ESPINOBARROS FELICIANO,  
JUAN CONTRERAS, CUTBERTO ORTIZ  
HERNÁNDEZ, ALEJANDRO JIMENEZ  
GONZALEZ, RENATO ROMERO  
ACUÑA, JOSÉ TAPIA, ANASTACIO  
LOPEZ SOLIS, and ABDON QUIRASCO  
SIXTECO, on behalf of themselves and all  
other similarly situated persons,  
)  
Plaintiffs,  
)  
v.  
)  
SCOTT FARMS, INC., ALICE H. SCOTT,  
LINWOOD H. SCOTT, JR., LINWOOD H.  
SCOTT III, DEWEY R. SCOTT, JFT  
HARVESTING INC., JUAN F. TORRES  
OASIS HARVESTING, INC.,  
and RAMIRO B. TORRES  
)  
Defendants.  
)

**JOINT MOTION FOR PRELIMINARY APPROVAL OF COLLECTIVE  
ACTION AND CLASS ACTION SETTLEMENT**

Plaintiffs and Scott Farms, Inc., Alice H. Scott, Linwood H. Scott, Jr., Linwood H. Scott, III, and Dewey R. Scott (collectively “Defendants”) jointly move this Court for entry of the stipulated order accompanying this Joint Motion approving the class action settlement agreement (attached as Exhibit 1). The terms of settlement are set on in Exhibit 2 to this Motion. Declarations of Plaintiffs’ Counsel Carol Brooke and Robert Willis accompany this Motion and are designated as Exhibit 3 and Exhibit 4, respectively.

**WHEREFORE** the parties respectfully request that the Court enter the proposed Order granting preliminary approval of the Settlement Agreement and granting the parties any other relief that the Court deems appropriate and necessary.

Respectfully submitted, this the 22<sup>nd</sup> day of October 2019.

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Civil Action No. 5:17-cv-356-FL

Ricardo Mondragon, et al., )  
Plaintiffs, )  
v. ) **CERTIFICATE OF SERVICE**  
)  
SCOTT FARMS, INC., et al., )  
Defendants. )

I hereby certify that on October 22, 2019, a copy of the foregoing *Motion* was filed with the Clerk of Court using the CM/ECF system, which will automatically serve all counsel of record, including:

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